

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[2] CADE COTHREN

NO. 3:22-cr-00282

JUDGE RICHARDSON

DECLARATION OF FBI SPECIAL AGENT CLAYTON D. WORCESTER JR.

1. I have been a Special Agent with the FBI for 16 years, having joined the FBI on December 7, 2008, and had 11 years of law enforcement experience with a sheriff's office prior to joining the FBI. I have a breadth of experience in criminal and national security investigations and have accumulated thousands of hours of investigative training and experience.
2. I participated in the investigation relating to Phoenix Solutions, Glen Casada, Cade Cothren, and Robin Smith.
3. In May 2019, news articles reported on text messages sent by Cade Cothren. These articles included the following:
 - a. Natalie Allison and Joel Ebert, *Rep. Glen Casada, Cade Cothren Sent Sexually Explicit Text Messages About Women*, THE TENNESSEAN, May 6, 2019, updated May 21, 2019 (attached hereto as Exhibit 1);
 - b. Joel Ebert and Natalie Allison, *House Speaker Glen Casada's Top Aide Admits Past Cocaine Use in Legislative Office Building*, THE TENNESSEAN, May 6, 2019, updated May 7, 2019 (attached hereto as Exhibit 2);
 - c. Phil Williams, *New Text Message Detail Drug Use, Vulgar Talk by Speaker's Chief of Staff*, NEWSCHANNEL 5 NASHVILLE, May 6, 2019, updated May 10, 2019 (attached hereto as Exhibit 3);
 - d. Kimberlee Kruesi, *Tennessee Speaker Calls Lewd Texts 'Locker Room Talk,'* ASSOCIATED PRESS, May 7, 2019 (attached hereto as Exhibit 4).
4. On or about March 7, 2025, I participated in an interview with former Tennessee House Republican caucus political director Daniel Cox. Among other things, Cox recalled receiving the September 24, 2020 email from "Matthew Phoenix." A copy of a September 2020 email exchange between Cox and "Mathew Phoenix" is attached hereto as Exhibit 5. Cox also recalled recorded calls he had with "Matthew Phoenix,"

in which “Matthew Phoenix” appeared to be attempting to disguise his voice. A copy of the FBI interview with Cox is attached hereto as Exhibit 6. Cox confirmed that Phoenix Solutions ultimately received tens of thousands of dollars from the Tennessee House Republican Caucus for work during the 2020 election cycle.

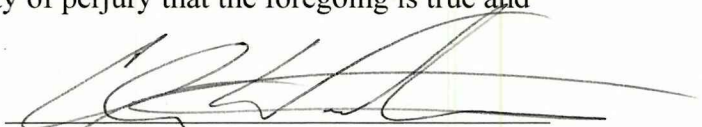
5. During the investigation, the FBI lawfully searched Cothren’s cell phone. A true and correct copy of a May 8, 2019 text exchange between Cothren and another person is attached hereto as Exhibit 7.
6. During FBI Special Agent Brent Hayden’s recorded interview of Cade Cothren on or about January 8, 2021, Cothren acknowledged that he had previously established the Faith Family Freedom Fund political action committee (“PAC”). He further stated that Sydney Friedopfer had been listed as the treasurer for the PAC.
7. On or about April 11, 2025, FBI Special Agent Brent Hayden participated in an interview of Sydney Friedopfer. Among other things, Friedopfer stated that she met Cothren on a dating app in May 2017 and the two were intimate when together. Friedopfer also stated that Cothren asked her to open a PAC for him because he couldn’t have his name on it and to list random names for the PAC’s officers. Friedopfer further stated that Cothren directed her to use a particular email account to open the Faith Family Freedom Fund PAC (“FFFF PAC”). She told SA Hayden that she never had access to the email account. Friedopfer reviewed emails purportedly sent by her on behalf of the FFFF PAC related to an investigation into FFFF PAC being conducted by the Tennessee Bureau of Ethics and Campaign Finance. Friedopfer stated that she did not send the emails nor give Cothren permission to do so. These emails are attached hereto as Exhibits 8, 9, and 10.
8. Additionally, on or about January 13, 2022, Friedopfer testified before the Registry of Election Finance of the Tennessee Bureau of Ethics and Campaign Finance (the “Registry”). A true and correct copy of the summary of her testimony, which the FBI obtained from the Registry, is attached hereto as Exhibit 11.
9. During the course of the investigation, the FBI lawfully searched the email address “cadecothren@gmail.com.” A true and correct copy of a January 9, 2020 email from Sydney Friedopfer to Cade Cothren is attached hereto as Exhibit 12.
10. During the course of the investigation, the FBI lawfully searched the email address “faithfamilyfreedomfund@gmail.com.” In addition to identifying Exhibits 8 and 9, Google produced the subscriber information for the email account. It is attached hereto as Exhibit 13. Among other things, Google’s subscriber information shows that the Internet Protocol (“IP”) address 136.29.148.39 was used to login to the account on June

25, 2021, the same day the account was deleted. In my training and experience, I know that an IP address is a series of numbers assigned to a device connected to the internet. During the course of the investigation, the FBI lawfully obtained subscriber information for the Gmail account "cadecothren@gmail.com." Google records reflected that the most recent IP address associated with that account was 136.29.148.39. *See* GX 107.

11. During the course of the investigation, the FBI lawfully searched Cothren's Twitter/X account, @cadecothren. Twitter identified Cothren's account using a series of numbers ending in 1568. Exhibit 14 is a true and correct copy of a Twitter direct-message exchange between Cothren and another Twitter user on or about March 17, 2023; the earliest direct message is at the bottom of the page. Exhibit 15 is a true and correct copy of a Twitter direct-message exchange between Cothren and another Twitter user on or about April 13, 2023.
12. In or about the summer of 2023, Twitter rebranded as "X." Exhibit 16 is a true and correct copy of a post from Cothren's X account on or about February 6, 2025. Exhibit 17 is a true and correct copy of a repost from Cothren's X account on or about May 21, 2025.
13. On or about April 1, 2025, the FBI received a transcription of a voicemail left by Glen Casada for a Tennessee Republican donor. The transcription stated in part,

I was hoping you could do me a favor. My case is gone before the Senate and the new committee called the weaponization of the FBI, and they're looking at my case that it's a, and it was, a political witch hunt. And that committee is looking at it today, and I was hoping today, it's kind of critical, that you could call Marsha Blackburn's office and Bill Haggerty and just put a good word in for me that, you know, Glenn served the state well. He didn't do this. This is a political witch hunt by the Biden administration. And if you could do that for me, it'd be greatly appreciated. And I have lost your cell number and I apologize. And so I had to leave this with you at your office.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on SEPTEMBER 9, 2025.


Clayton D. Worcester Jr.
Special Agent
Federal Bureau of Investigation